

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

DECLARATION OF LEITA WALKER

I, Leita Walker, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Defendant Netflix, Inc., in the above-captioned action. I have personal knowledge of the matters set forth herein. I make this declaration in support of Defendants' Joint and Unopposed Civil L.R. 7(h) Expedited Non-Dispositive Motion for Leave to Exceed Page Limit for Brief.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced by the Producer Defendants in the course of discovery, bates stamped CHRM004677. As seen on pages 4724 through 4725 of Exhibit 1, the Wisconsin Department of Justice Case Activity Report of Special Agent Debra K. Strauss states "[t]he following is a list of documents which were being maintained in a safe in the office of Sheriff Petersen," including "a one-page statement signed by Sergeant ANDREW L. COLBORN."

3. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt from the deposition of Plaintiff Andrew Colborn, lines 4 through 11 of transcript page 404, in which he admits that his written statement was kept in the sheriff's department safe.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a document produced by Plaintiff's former counsel of record, Michael Griesbach, bates stamped Griesbach0000454. On page 468 of Exhibit 3, encircled and highlighted, Mr. Griesbach handwrote that the Wisconsin DOJ "Report said nothing re Brown Co. jail call to Colburn . . . in S.O. [sheriff's office] safe."

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 6, 2022

/s/Leita Walker
Leita Walker